

## NEW ZEALAND HORTICULTURE EXPORT AUTHORITY

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Country of Origin Labelling Programme  
Agricultural Marketing Service  
United States Department of Agriculture  
Stop 0249  
Room 2092-S  
1400 Independence Avenue, SW  
Washington DC 20250-0249  
UNITED STATES OF AMERICA

Dear Sir/Madam

### **Voluntary Country of Origin Labelling**

The New Zealand Horticulture Export Authority is a regulatory body established to encourage a co-ordinated approach to exporting horticultural products from New Zealand. The Authority is fully industry funded, with contributions from both growers and exporters.

We currently represent 10 Product Groups: Buttercup Squash, Avocados, Summerfruit, Blackcurrants, Boysenberries, Persimmons, Nashi Asian Pears, Chestnuts, Table Grapes, and Tamarillos. We have 65 licenced exporters of these products. Under the New Zealand Horticulture Export Authority Act 1987, the Authority is mandated to liaise with horticultural groups on barriers to trade and work towards their removal.

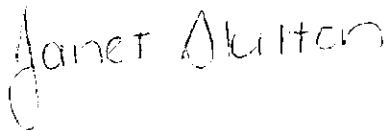
We are concerned about the introduction of voluntary Country of Origin Labelling for the following reasons:

- This appears to be a non-tariff trade barrier which has the potential to disadvantage imported product. We do not believe that this is consistent with the United States obligations to the WTO.
- Voluntary Country of Origin labelling is being presented as a food safety initiative but the implication appears to be that food produced in the United States is "safer" than food produced in other countries. New Zealand fruit and vegetables are either inspected by USDA under a pre-clearance programme or assurances are provided by New Zealand government authorities, primarily the Ministry of Agriculture or the New Zealand Food Safety Authority. These assurances are rigorous, have been accepted and approved by USDA and are provided at significant cost to the New Zealand industry.

- There will be costs attached to this labelling programme. A portion of these will be passed back to the exporter and ultimately the New Zealand grower, reducing returns.
- Most fruit and vegetable products exported from New Zealand to the United States are packed in cartons clearly indicating "Product of New Zealand". New Zealand growers/exporters have to depend on the United States retailer to ensure that the country of origin is correctly presented to consumers.
- It is not applied across all agricultural commodity products. Why is poultry treated differently to other products? This does not meet the aim of providing consumers with information to make purchase decisions.

We urge the United States government to reconsider the introduction of the voluntary Country of Origin labelling system.

Yours sincerely



Janet Skilton  
Executive Director